



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 16, 2021

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Court
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

USDC SDNY
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Re: *United States v. Navarro et al.*, 20 Cr. 160 (MKV)

Dear Judge Vyskocil:

The Government respectfully writes in response to the Court's directive that the parties confer and propose trial-related deadlines for the defendants proceeding to trial in Group 2: Rick Dane Jr. and Rebecca Linke. After conferring with counsel for each defendant, the parties jointly propose that the following deadlines be entered after the parties have received a confirmed trial date:

- Expert disclosures – ~~8 weeks before trial~~ **January 7, 2022**
- Initial production of select 3500 material – ~~5 weeks before trial~~ **January 28, 2022**
- Motions *in limine*, requests to charge, proposed voir dire questions, and jury verdict form – ~~4 weeks before trial~~ **February 4, 2022**
- Any opposition to motions *in limine* – ~~2 weeks before trial~~ **February 14, 2022**

The parties are available should the Court have any questions regarding the proposed schedule.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/

Andrew C. Adams
Sarah Mortazavi
Assistant United States Attorneys
212-637-2340 / 2520

So Ordered.

Date: Nov. 18, 2021
New York, New York

Mary Kay Vyskocil
Mary Kay Vyskocil
United States District Judge